

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CISCO SYSTEMS, INC.,

Plaintiff,

v.

SYNAMEDIA LTD F/K/A TRITON UK BIDCO  
LIMITED,

Defendant.

1:20-cv-10879-LTS-SN

**NOTICE OF MOTION TO  
DISMISS THE COMPLAINT**

PLEASE TAKE NOTICE that upon the Declaration of Matthew D. Parrott dated January 25, 2021 with attached exhibits, the accompanying Memorandum of Law, and upon all prior pleadings and proceedings, defendant Synamedia Limited f/k/a Triton UK Bidco Limited (“Synamedia”), by and through its counsel, will move this Court, at a date and time to be determined by the Court, for an order dismissing Plaintiff’s complaint with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief can be granted, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that in accordance with Sections 2(b)(i)(1) and (b)(ii) of the Individual of Practices of this Court, Synamedia has used its best efforts to informally resolve the matters raised in its motion to dismiss plaintiff’s complaint.

PLEASE TAKE FURTHER NOTICE that in accordance with Sections 2(b)(i)(2) and (b)(ii) of the Individual Practices of this Court, Plaintiff’s complaint has not been amended in response to the arguments raised in Synamedia’s motion to dismiss plaintiff’s complaint.

Dated: New York, New York  
January 25, 2021

FRIED, FRANK, HARRIS, SHRIVER  
& JACOBSON LLP

By: /s Matthew D. Parrott  
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